

201-14969

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR


**American
Chemistry
Council**
*Good Chemistry
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December 24, 2003

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-To-Know Program

RECEIVED
OPPT 081C
03 DEC 30 PM 3:19

Re: Benzoyl Chloride Test Plan for Benzoates Panel, HPV Consortium

Dear Administrator Leavitt:

The American Chemistry Council's Benzoates Panel (Panel) is pleased to submit for review and public comment its Test Plan, including robust summaries, for Benzoyl Chloride (CAS # 98-88-4) under the High Production Volume (HPV) Chemical Challenge Program.

The test plan proposes that the following tests be conducted in order to complete an initial hazard assessment of benzoyl chloride:

- Alga, Growth Inhibition Test (OECD 201)
- Combined Repeated Dose Toxicity with Reproduction/Developmental Toxicity Screening Test (OECD 422)

The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

The Panel members are presently working on an arrangement to fund these tests and, as an alternative, the Panel is considering fulfilling its HPV commitment through the International Council of Chemical Association's (ICCA) HPV Initiative. The Panel will provide EPA with a follow up letter once these decisions are made.



Responsible Care®

Michael O. Leavitt, Administrator
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Please return comments or questions regarding this Test Plan to John Morris, the Panel Manager, at john_morris@americanchemistry.com or (703) 741-5631.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachment

cc with attachment:
Benzoates Panel
Steve Russell, ACC
Jim Keith, ACC